

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
DEL RIO DIVISION

THE STATE OF TEXAS,

Plaintiff,

v.

U.S. DEPARTMENT OF HOMELAND
SECURITY, *et al.*,

Defendants.

§
§
§
§
§
§
§
§

CIVIL ACTION NO. 2:23-CV-00055-AM

PLAINTIFF'S NOTICE OF FILING OF AMENDED DECLARATION OF
MANUEL PEREZ

Plaintiff The State of Texas hereby files the revised Declaration of Manuel Perez in support of Plaintiff's Motion for Preliminary Injunction (ECF No. 3).

Plaintiff filed the original version of the Declaration of Manuel Perez herein on October 24, 2023, as part of the Appendix to Plaintiff's Motion for Preliminary Injunction (ECF No. 3-2, Appx. 001-003). The Court in its Order dated October 30, 2023 (ECF. No. 9) pointed out on page 5 in footnote 1 that the original Declaration of Manuel Perez was not sworn and did not include a penalty of perjury statement.

The revised Declaration of Manuel Perez attached hereto, which includes a penalty of perjury statement in accordance with 28 U.S. C. §1746, is offered in support of Plaintiff's pending Motion for Preliminary Injunction.

Dated: November 2, 2023.

Respectfully submitted.

KEN PAXTON

Attorney General of Texas

/s/ Ryan D. Walters

RYAN D. WALTERS

Chief, Special Litigation Division

Texas Bar No. 24105085

BRENT WEBSTER

First Assistant Attorney General

GRANT DORFMAN

Deputy First Assistant Attorney General

MUNERA AL-FUHAID

Special Counsel

Texas Bar No. 24094501

RALPH MOLINA

Deputy Attorney General for Legal Strategy

HEATHER L. DYER

Special Counsel

Texas Bar No. 24123044

SUSANNA DOKUPIL

Special Counsel

Texas Bar No. 24034419

DAVID BRYANT

Special Counsel

Texas Bar No. 03281500

ROBERT HENNEKE

Texas Bar No. 24046058

Texas Public Policy Foundation

901 Congress Ave.

Austin, Texas 78701

(512) 472-2700

rhenneke@texaspolicy.com

Office of the Attorney General

Special Litigation Division

P.O. Box 12548, Capitol Station

Austin, Texas 78711-2548

(512) 936-1706

Ryan.Walters@oag.texas.gov

Munera.Al-Fuhaid@oag.texas.gov

Heather.Dyer@oag.texas.gov

David.Bryant@oag.texas.gov

COUNSEL FOR PLAINTIFF

CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing document was filed electronically (via CM/ECF) on November 2, 2023, which automatically serves all counsel of record who are registered to receive notices in this case. I also served a copy of this document via email to counsel for Defendants, Jean Lin, at Jean.Lin@usdoj.gov.

/s/Ryan D. Walters

RYAN D. WALTERS